

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA**

KEDDRICK BROWN, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

PROGRESSIVE MOUNTAIN
INSURANCE COMPANY,

Defendant.

Consolidated Case No.:
3:21-cv-00175-TCB

MICHELLE BOST, individually and
on behalf of all others similarly
situated,

Plaintiff,

v.

PROGRESSIVE PREMIER
INSURANCE COMPANY OF
ILLINOIS,

Defendants.

**PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

Pursuant to Federal Rule of Civil Procedure 23(e), Plaintiffs, Keddrick Brown and Michelle Bost, hereby move this Court for an order (1) preliminarily approving the Settlement, (2) provisionally certifying the Settlement Classes, (3) appointing Plaintiffs Michelle Bost and Keddrick Brown as Settlement Class Representatives, (4) appointing Carney Bates & Pulliam, PLLC, Jacobson Phillips PLLC, Normand PLLC, Edelsberg Law, P.A., Shamis & Gentile, and Bailey Glasser LLP as Class Counsel for the Settlement Classes, (5) approving Epiq Class Action and Claims Solutions, Inc. as Settlement Administrator, (6) approving the form and manner of Class Notice to the Settlement Classes, (7) approving the proposed schedule of events, and (8) scheduling a Final Fairness Hearing.

For the reasons set forth in the accompanying Memorandum of Law (Exhibit 1), Declaration of Hank Bates in Support of Motion for Preliminary Approval filed contemporaneously herewith, and Declaration of Cameron R. Azari, Esq. on Settlement Notice Plan (Exhibit 2), this Court should enter an Order granting preliminary approving the Settlement Classes. A proposed Order Granting Preliminary Approval is attached hereto as Exhibit 3.

Respectfully submitted this 14th day of February, 2025.

/s/ Jake Phillips

Jacob L. Phillips*

Joshua R. Jacobson*

JACOBSON PHILLIPS PLLC

478 E. Altamonte Dr., Ste. 108-570

Altamonte Springs, Florida 32701

Tel: (407) 720-4057
Email: jacob@jacobsonphillips.com
Email: joshua@jacobsonphillips.com

Hank Bates*
Lee Lowther*
CARNEY BATES & PULLIAM,
PLLC
One Allied Drive, Suite 1400
Little Rock, Arkansas 72202
Tel: (501) 312-8500
Email: hbates@cbplaw.com
Email: llowther@cbplaw.com

Andrew J. Shamis
Georgia Bar No. 494196
SHAMIS & GENTILE, P.A.
14 NE 1st Avenue, Suite 705
Miami, Florida 33132
Tel: (305) 479-2299
Email: ashamis@shamisgentile.com

Scott Edelsberg
EDELSBERG LAW, P.A.
20900 NE 30th Ave., Suite 417
Aventura, Florida 33180
Tel: (786) 289-9471
Email: scott@edelsberglaw.com

James L. Kauffman*
Brian A. Glasser*
Patricia M. Kipnis*
Bailey & Glasser LLP
1055 Thomas Jefferson St., N.W.
Washington, DC 20007
202-463-2101
Email: jkauffman@baileyglasser.com
Email: bglasser@baileyglasser.com
Email: [kipnis@baileyglasser.com](mailto:pkipnis@baileyglasser.com)

R. Brent Irby

Georgia Bar No. 224232
IRBY LAW, LLC
2201 Arlington Avenue S
Birmingham, Alabama 35205
Tel: (205) 545-8334
Email: birby@mhclaw.com

Michael J. Lober
Georgia Bar No. 455580
William Greg Dobson
Georgia Bar No. 237770
LOBER & DOBSON, LLC
Robert E. Lee Building, Suite 201
830 Mulberry Street
Macon, Georgia 31201
Tel: (478) 745-7700
Email: wgd@lddlawyers.com
Email: mjlober@lddlawyers.com

*Admitted *pro hac vice*

*Counsel for Plaintiffs and the
Proposed Class*

CERTIFICATE OF SERVICE

I, Jacob L. Phillips, hereby certify that on this 14th day of February, 2025, I electronically filed the foregoing via the Court's CM/ECF system, which will provide electronic notification to all counsel of record.

/s/Jake Phillips
Attorney for Plaintiffs